

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
(Newark Vicinage)

IN RE: AMERICAN MEDICAL  
COLLECTION AGENCY, INC.  
CUSTOMER DATA SECURITY  
BREACH LITIGATION

Civil No. 2:19-md-02904-MCA-MAH

Judge Madeline Cox Arleo

This Document Relates To:  
Case No. 2:24-cv-00569-MCA-MAH,  
*Bratten v. Quest Diagnostics et al.*,  
*Quest/Optum Track*

**DECLARATION OF HEATHER BENZMILLER SULTANIAN**  
**IN SUPPORT OF MOTION TO DISMISS OR, IN THE ALTERNATIVE,**  
**MOTION FOR SUMMARY JUDGMENT**

I, Heather Benzmilller Sultanian, declare and state under penalty of perjury as follows:

1. I am a partner of the law firm Sidley Austin LLP and counsel to Defendant Quest Diagnostics Incorporated (“Quest”) in the above-captioned proceeding. I submit this declaration in support of Defendants Quest Diagnostics and Optum360’s Motion to Dismiss or, in the alternative, Motion for Summary Judgment. I have personal knowledge of the facts stated herein and, if called upon to testify, I could and would testify competently thereto under oath.

2. Attached as **Exhibit A** is a true and correct copy of a document titled

“Notice of Data Breach” produced by Plaintiffs in this action at beginning Bates number Plaintiffs\_Q\_00093.

3. Attached as **Exhibit B** is a true and correct copy of a document titled “Service Agreement” produced by Quest in this action at beginning Bates number Quest\_MDL\_0000516.

4. Attached as **Exhibit C** is a true and correct copy of excerpts of the March 13, 2023 Deposition Transcript of Jennifer Kain.

5. Attached as **Exhibit D** is a true and correct copy of excerpts of the February 19, 2023 Deposition Transcript of Jeffrey S. Wollman.

6. Attached as **Exhibit E** is a true and correct copy of excerpts of the February 28, 2023 Deposition Transcript of Quest.

7. Attached as **Exhibit F** is a true and correct copy of excerpts of the February 8, 2023 Deposition Transcript of Russell Fuchs.

8. Attached as **Exhibit G** is a true and correct copy of excerpts of the March 21, 2023 Deposition Transcript of David Ulrich.

9. Attached as **Exhibit H** is a true and correct copy of excerpts of the March 16, 2023 Deposition Transcript of Juan Pablo Lake.

10. Attached as **Exhibit I** is a true and correct copy of excerpts of the April 7, 2023 Deposition Transcript of Michelena Harkins.

11. Attached as **Exhibit J** is a true and correct copy of a document titled “Laboratory Invoice” produced by Plaintiffs in this action at beginning Bates number

Plaintiffs\_Q\_00013.

12. Attached as **Exhibit K** is a true and correct copy of a document titled “Laboratory Invoice” produced by Plaintiffs in this action at beginning Bates number Plaintiffs\_Q\_00184.

13. Attached as **Exhibit L** is a true and correct copy of a document titled “Disposition Review” produced by AMCA in this action at beginning Bates number AMCA\_PROD\_00022984.

14. Attached as **Exhibit M** is a true and correct copy of a document titled “American Medical Collection Agency RPF Presentation” produced by Quest in this action at beginning Bates number Quest\_MDL\_0024321.

Pursuant to 28 U.S.C. § 1756, I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 11, 2024

/s/ Heather Benzmilller Sultanian  
Heather Benzmilller Sultanian